

**U.S. ENVIRONMENTAL PROTECTION AGENCY
LEAD TESTING IN SCHOOL AND CHILD CARE PROGRAM
DRINKING WATER GRANT**

FY 2020 Allotment Request

Please note: all new/changed text related to the FY 2020 request is highlighted in yellow

Submitted to U.S. E.P.A.

July 10, 2020

WORK PLAN FOR THE STATE OF INDIANA

Summary Statement for the FY 2020 Allotment Request

Since the award of the FY 18/19 grant, several significant events occurred that impacted the IFA *Lead Sampling Program for Schools and Child Care Facilities* (“LSP”).

First, in March 2020 the State of Indiana enacted House Enrolled Act 1265, which mandates testing for lead in drinking water at schools before January 2023. The IFA’s FY 18/19 *Lead Testing in School and Child Care Program Drinking Water Grant* application anticipated a larger number of child care facility applications in proportion to school applications. However, as a result of the new law, the IFA now expects a larger number of schools to apply. The impact of this change to the FY 2020 allotment request is a reduced number of facilities anticipated to apply (from 660 to 500) but, because the number of fixtures per school building (40) is four times that of child care facilities (10), an increase in the total number of samples anticipated to be collected (from 16,000 to 44,000).

Second, in March 2020, Indiana Governor Holcomb determined it necessary to close all Indiana schools as a result of the COVID-19 pandemic. Per the EPA 3Ts Guidance, lead sampling should only occur under normal water use conditions, which is not the case when buildings are closed. In addition, school staff were not allowed to be in buildings to collect samples. As a result, no samples were collected as part of the IFA’s LSP from mid-March until August, when schools are anticipated to re-open. The impact on the IFA’s LSP, is the need to extend the FY 20 allotment timeline to allow schools to have more time to complete sampling.

Also in March 2020, the IFA finalized its agreement with its contractor to provide lead sampling coordination services for a two-year period. The total amount of the two-year agreement will be funded by the FY 18/19 grant award (\$753,000) and the voluntary FY 18/19 state match (\$42,300), the anticipated FY 20 allotment (\$415,000), and the additional voluntary state match dollars (\$152,700). The FY 20 allotment will be applied to the second year of services which requires the extension of the grant period from 9/30/21 to 12/31/21.

Summary Statement

Indiana is proactively looking for opportunities to further safeguard children's health by reducing exposure to lead. In 2017, the Indiana Finance Authority ("IFA") began the *Lead Sampling Program for Public Schools* initiative to assess the presence of lead in public school drinking water. The IFA collected and analyzed over 57,000 samples in 915 schools, thereby assisting Indiana schools in their effort to reduce potential drinking water lead exposure.

With the funding appropriated under section 1464(d) of the Safe Drinking Water Act, amended by the Water Infrastructure Improvement for the Nation Act ("WIIN") section 2107, the IFA plans to expand Indiana's lead sampling program into child care facilities. This will include the prioritization of facilities serving young children (ages six and under), underserved and low-income communities, and facilities that are older and more likely to contain lead plumbing.

The IFA is using EPA's 3Ts guidance as a model to: (1) **Communicate**, throughout the implementation of the program, the results and important lead information to the public, parents, teachers, and larger community; (2) **Train** child care facilities and schools about the risks of lead in drinking water and teach them approved lead sampling in drinking water methods; (3) **Test** using appropriate testing protocols and a certified laboratory; and (4) **Take Action**, including the development of a plan for responding to results and addressing potential sources of lead, where necessary.

For more information on previous efforts conducted in Indiana, please see:

<https://www.in.gov/ifa/2958.htm>.

SCOPE OF WORK

This section is a discussion of the IFA's plan to develop and implement the LSP and how this program meets Indiana's and this grant's goals of reducing potential drinking water lead exposure in schools and child care facilities.

The scope of work contained in this work plan includes the following categories and information.

- I. STATE GOALS AND PRIORITIES
- II. PROGRAM IMPLEMENTATION AND ACTIVITIES
- III. ROLES AND RESPONSIBILITIES
- IV. TIMELINE AND MILESTONES
- V. WIIN PROGRAMMATIC PRIORITIES AND EPA'S STRATEGIC PLAN
- VI. ANTICIPATED OUTCOMES/OUTPUTS
- VII. BUDGET NARRATIVE

Appendices:

- A. PARTNERS UNDER THIS PROGRAM

I. STATE GOALS AND PRIORITIES:

According to the US Census, Indiana has approximately 500,000 children under the age of six, the age group most vulnerable to lead exposure. As stated by the 2017 Annual Report of the Indiana Early Learning Advisory Committee, approximately 130,000 participate in at least one of the 4,400 child care facilities known to the State of Indiana. Safeguarding drinking water in schools and child care facilities will benefit a significant number of children. The IFA has identified goals and priorities consistent with the priorities outlined in the EPA's State Lead Testing in School and Child Care Program Drinking Water Grant Implementation Document (found here: www.epa.gov/safewater/grants).

In accordance with the America's Waters Infrastructure Act (AWIA) of 2018, which amended the SDWA section 1464(d), the IFA will prioritize funding for schools and child care facilities in low-income areas. The IFA has developed a ranking system to effectively target funding to what the IFA believes to be the greatest need. Ranks are established by the following weighted criteria:

(1) Low-income eligibility, defined by the IFA as:

- a. Children receiving free or reduced lunch at a public school or child care facility
- b. Head Start or Early Head Start program
- c. Child Care and Development Fund ("CCDF") children enrolled (<https://www.in.gov/fssa/carefinder/3900.htm>)
- d. On-My-Way-Pre-K children enrolled (<https://www.in.gov/fssa/carefinder/4932.htm>)

(2) School or Child Care Facility Age:

- a. Older than 1988

(3) Child's Age:

- a. Children younger than six

(4) School or Child Care Facility Permanence:

- a. Factors that indicate the building will remain a child care facility or school during the length of the program.

It is the IFA's goal to reduce lead exposure at these facilities by testing for lead, identifying potential lead sources, and taking action. Using the priorities listed above, this testing effort includes the following goals:

- (1) Testing all fixtures used for consumption at an estimated 500 schools and child care facilities that meet the above described need criteria and which did not participate in the 2017-2018 Lead Sampling Program for Public Schools
- (2) Providing enrolled child care facilities and schools an online database to track testing progress and results
- (3) Providing education about lead and the importance of testing to all enrolled schools and

child care facilities

- (4) Teaching enrolled child care facilities and schools proper lead sampling techniques.

II. PROGRAM IMPLEMENTATION AND ACTIVITIES:

The IFA is utilizing EPA's 3Ts guidance (www.epa.gov/safewater/3ts) and the Indiana Department of Environmental Management's ("IDEM") school lead sampling guidance (http://www.state.in.us/idem/cleanwater/files/dw_compliance_lead_school_sampling.pdf) to implement the LSP. The IFA also anticipates recruiting 120WaterAudit, a software-as-a-service company, to assist with LSP implementation and activities. 120WaterAudit previously assisted IFA with the 2017-2018 Lead Sampling Program for Public Schools.

In this program, the IFA will:

- (1) **Communicate** sampling results and important lead information to the public, parents, teachers, and larger community throughout the implementation of the program
- (2) **Train** participating schools and child care facilities on the risks of lead in drinking water, approved lead sampling techniques, and remediation strategies
- (3) **Test** drinking water fixtures at child care facilities and schools using appropriate testing protocols and certified laboratories
- (4) **Take Action**, including the development of a plan for responding to results of testing conducted and addressing potential elevated lead where necessary.

Below are specific activities included in these key elements:

(1) **Communication:**

The IFA will establish key partnerships to support the program as well as keeping the public informed (see more on partnerships in Appendix A). Indiana recognizes that timely dissemination of communication materials is of the utmost importance. Therefore, information about the LSP will be shared before the program begins, after obtaining the results of testing, when/if corrective measures are decided upon (and in the event no corrective measures are appropriate because the lead levels are low), and in response to periodic interest in the program. Specifically:

- i. Testing results will be shared with the school's or child care facility's community as soon as possible
- ii. General public education and updates to the IFA's LSP website (www.in.gov/ifa/2998.htm) will be made on an ongoing basis and can be accessed by the public.

The IFA will be using a variety of methods to communicate and be transparent throughout this program with the goal of reaching target audiences, including: presentations, email, and websites (<https://www.in.gov/ifa/2998.htm>). There will also be a dedicated email address (IFALeas@ifa.in.gov) made available for any additional questions or requests for information. In addition, schools and child care facilities will be required to make a copy of voluntary testing results available in the

administrative offices or on their public website.

The IFA has identified our target audiences as: child care facilities, schools, local health departments, and the drinking water community (e.g. utilities serving these facilities).

(2) Training:

The IFA will train approved school and child care facility staff about the risks of lead in drinking water, proper lead sampling techniques, and remediation strategies. This may also include local or state health department officials, public water suppliers, and local or state child care regulators if the IFA pre-approves them to collect samples on behalf of the school and child care facility.

The IFA will develop webinars and guidance regarding the risk of lead in drinking water, lead sampling techniques, and remediation strategies.

Indiana is also developing key partnerships to support the program and help train staff. These are detailed in Appendix A.

(3) Testing:

The IFA is utilizing EPA's 3Ts guidance (www.epa.gov/safewater/3ts), the Indiana Department of Environmental Management's ("IDEM") school lead sampling guidance (http://www.state.in.us/idem/cleanwater/files/dw_compliance_lead_school_sampling.pdf), and partner laboratories, which are certified to test lead in drinking water, to process and analyze samples collected under this program.

Based on the results of the 2017 IFA *Lead Sampling Program for Public Schools*, the IFA estimates:

- i. Testing approximately 500 facilities;
- ii. An average of 40 fixtures per school and 10 fixtures per child care facility;
- iii. Collecting an initial 250 mL first-draw sample and a 30-second flush at all potable water faucets, for a total of approximately 80 samples per school and 20 samples per child care facility. The actual number of flush samples may be reduced during the QA/QC review to prevent flush samples from effecting downstream first-draw samples;
- iv. Collecting an additional 10% of post remediation follow up samples to confirm the effectiveness of the remediation actions.
- v. Collecting as many as 44,000 total number of samples

All sampling efforts under this program will be coded and recorded using an online database.

(4) Taking Action:

The IFA has developed a plan for responding to sampling results and addressing potential sources of lead, where necessary. Responses to results will follow remediation recommendations by the 3Ts and guidance provided by IDEM. The LSP will follow the state action level of 15 parts per billion (the action level in the federal Lead and Copper Rule), as described in the IDEM school lead sampling guidance (http://www.state.in.us/idem/cleanwater/files/dw_compliance_lead_school_sampling.pdf) Enrolled child care facilities will be responsible for implementing and funding remediation actions. This plan also includes post-remediation sampling to ensure efforts to reduce lead levels were effective.

ROLES AND RESPONSIBILITIES:

A list of roles and responsibilities are listed below, and potential project partners are identified in Appendix A.

IFA Program Director: This person will oversee the Lead Sampling Program for Schools and Child Care Facilities project and will guide coordination between partners, including 120WaterAudit.	Sarah Hudson, IFA 100 N. Senate Ave, RM 1275 Indianapolis, IN 46204 sahudson@ifa.in.gov
IFA Project Manager: This person will act as the point of contact for the Lead Sampling Program for Schools and Child Care Facilities project.	Sarah Hudson, IFA 100 N. Senate Ave, RM 1275 Indianapolis, IN 46204 sahudson@ifa.in.gov
Public Communications Team: This team will share LSP goals, scope, and mission to external stakeholders, and make sure the IFA website stays current.	IFA
Program Manager: This person will act as the point of contact for schools and child care facilities during the sampling plan design/review phase.	120WaterAudit
Remediation Technician: This person will assist schools and child care facilities in interpreting sampling results. They will also provide guidance on appropriate remediation steps to reduce the presence of lead in drinking water below the action level.	120WaterAudit
Facility Contact: This person will enroll the facility in the program, complete LSP training, collect samples, implement remediation strategies, and make sampling results publically available.	Facility representative
Recordkeeping Contact: Ensure a central repository is created to house all sampling records and results letters.	120WaterAudit
Disseminate Information: the following organizations will help share information with stakeholders:	Indiana State Department of Health, Indiana Head Start Association, Indiana Section American Water Works Association, Indiana Department of Education, Indiana Association of Public School Superintendents, Indiana Association of School Business Officials

III. TIMELINE AND MILESTONES:

A detailed timeline for the project, including milestones for specific tasks, can be found below.

CY2019 Quarter 3: Jul Aug Sep

IFA:

- Assemble program team
- Develop application
- Publish resources and information on IFA webpage
- Apply for funding from federal award agency
- Advertise program to schools and child care facilities through relevant partners
- Accept applications to the LSP
- Score and rank applicants

Significant Milestone:

- LSP application period

CY2019 Quarter 4: Oct Nov Dec

120WaterAudit:

- Beta test online database
- Pilot test program workflow
- Review and approve or revise facility created sampling plans
- Deliver sampling packages to facilities
- Provide facility support throughout sampling process
- Coordinate sample delivery to laboratories
- Communicate test results between laboratories and facilities
- Advise remediation strategies to facilities, if needed
- Recommend follow-up sampling plans, if needed

School and Child Care Facilities:

- Enroll in lead education and sample collection training
- Develop sampling plan and fixture map
- Collect samples and return samples to lab via prepaid, provided postage
- Remediate fixtures, if needed
- Communicate sampling results to relevant stakeholders

Significant Milestone:

- Enrolled participants begin program steps

CY2020 Quarter 1: Jan Feb Mar

120WaterAudit:

- Review and approve or revise facility created sampling plans
- Deliver sampling packages to facilities
- Provide facility support throughout sampling process
- Coordinate sample delivery to laboratories
- Communicate test results between laboratories and facilities
- Advise remediation strategies to facilities, if needed
- Recommend follow-up sampling plans, if needed

Schools and Child Care Facilities:

- Enroll in lead education and sample collection training
- Develop sampling plan and fixture map
- Collect samples and return samples to lab via prepaid, provided postage
- Remediate fixtures, if needed
- Communicate sampling results to relevant stakeholders

Significant Milestone:

- 100 facilities accepted into program.
- Training webinars conducted.
- 10 facilities (2% of 500 total facilities) were able to sample before COVID -19 closures impacted work. Remaining schools unable to proceed with sampling.

CY2020 Quarter 2: Apr May Jun

IFA:

- Advertise program to schools and child care facilities through relevant partners
- Accept applications to the LSP

120WaterAudit:

- Review and approve or revise facility created sampling plans
- Deliver sampling packages to facilities

Schools and Child Care Facilities:

- Enroll in lead education and sample collection training

Significant Milestone:

- Sampling continues to be impacted by COVID-19 and summer break closures.

CY2020 Quarter 3: Jul Aug Sep

120WaterAudit:

- Review and approve or revise facility created sampling plans
- Deliver sampling packages to facilities
- Provide facility support throughout sampling process
- Coordinate sample delivery to laboratories
- Communicate test results between laboratories and facilities
- Advise remediation strategies to facilities, if needed
- Recommend follow-up sampling plans, if needed

Child Care Facilities:

- Enroll in lead education and sample collection training
- Develop sampling plan and fixture map
- Collect samples and return samples to lab via prepaid, provided postage
- Remediate fixtures, if needed
- Communicate sampling results to relevant stakeholders

Significant Milestone:

- IFA expects to sample approximately 100 new facilities by the end of CY2020 Quarter 3. Cumulative total number of facilities sampled is approximately 110 which is 22% of the 500 total facilities.

CY2020 Quarter 4: Oct Nov Dec

120WaterAudit:

- Review and approve or revise facility created sampling plans
- Deliver sampling packages to facilities
- Provide facility support throughout sampling process
- Coordinate sample delivery to laboratories
- Communicate test results between laboratories and facilities
- Advise remediation strategies to facilities, if needed
- Recommend follow-up sampling plans, if needed

Child Care Facilities:

- Enroll in lead education and sample collection training
- Develop sampling plan and fixture map
- Collect samples and return samples to lab via prepaid, provided postage
- Remediate fixtures, if needed

- Communicate sampling results to relevant stakeholders

Significant Milestone:

- IFA expects to sample approximately 80 new facilities by the end of CY2020 Quarter 4. Cumulative total number of facilities sampled is approximately 190 which is 38% of the 500 total facilities.

CY2021 Quarter 1: Jan Feb Mar

120WaterAudit:

- Review and approve or revise facility created sampling plans
- Deliver sampling packages to facilities
- Provide facility support throughout sampling process
- Coordinate sample delivery to laboratories
- Communicate test results between laboratories and facilities
- Advise remediation strategies to facilities, if needed
- Recommend follow-up sampling plans, if needed

Child Care Facilities:

- Enroll in lead education and sample collection training
- Develop sampling plan and fixture map
- Collect samples and return samples to lab via prepaid, provided postage
- Remediate fixtures, if needed
- Communicate sampling results to relevant stakeholders

Significant Milestone:

- IFA expects to sample approximately 80 new facilities by the end of CY2021 Quarter 1. Cumulative total number of facilities sampled is approximately 270 which is 54% of the 500 total facilities.

CY2021 Quarter 2: Apr May Jun

120WaterAudit:

- Review and approve or revise facility created sampling plans
- Deliver sampling packages to facilities
- Provide facility support throughout sampling process
- Coordinate sample delivery to laboratories
- Communicate test results between laboratories and facilities
- Advise remediation strategies to facilities, if needed
- Recommend follow-up sampling plans, if needed

Child Care Facilities:

- Enroll in lead education and sample collection training
- Develop sampling plan and fixture map
- Collect samples and return samples to lab via prepaid, provided postage
- Remediate fixtures, if needed
- Communicate sampling results to relevant stakeholders

Significant Milestone:

- IFA expects to sample approximately 80 new facilities by the end of CY2021 Quarter 2. Cumulative total number of facilities sampled is approximately 350 which is 70% of the 500 total facilities.

CY2021 Quarter 3: Jul Aug Sep

120WaterAudit:

- Review and approve or revise facility created sampling plans
- Deliver sampling packages to facilities
- Provide facility support throughout sampling process
- Coordinate sample delivery to laboratories
- Communicate test results between laboratories and facilities
- Advise remediation strategies to facilities, if needed
- Recommend follow-up sampling plans, if needed

Child Care Facilities:

- Enroll in lead education and sample collection training
- Develop sampling plan and fixture map
- Collect samples and return samples to lab via prepaid, provided postage
- Remediate fixtures, if needed
- Communicate sampling results to relevant stakeholders

Significant Milestone:

- IFA expects to sample approximately 80 new facilities by the end of CY2021 Quarter 3. Cumulative total number of facilities sampled is approximately 430 which is 86% of the 500 total facilities.

CY2021 Quarter 4: Oct Nov Dec

120WaterAudit:

- Review and approve or revise facility created sampling plans
- Deliver sampling packages to facilities

- Provide facility support throughout sampling process
- Coordinate sample delivery to laboratories
- Communicate test results between laboratories and facilities
- Advise remediation strategies to facilities, if needed
- Recommend follow-up sampling plans, if needed

Child Care Facilities:

- Enroll in lead education and sample collection training
- Develop sampling plan and fixture map
- Collect samples and return samples to lab via prepaid, provided postage
- Remediate fixtures, if needed
- Communicate sampling results to relevant stakeholders

Significant Milestone:

- IFA expects to sample approximately 70 new facilities by the end of CY2021 Quarter 4. Cumulative total number of facilities sampled is approximately 500 which is 100% of the 500 total facilities.

Additional information will be provided by EPA in the Terms and Conditions for project completion. The project objectives and milestones will align with the terms and conditions as required by the Agency.

IV. WIIN PROGRAMMATIC PRIORITIES AND EPA'S STRATEGIC PLAN:

The principal objective of the assistance to be awarded under this program is to provide grants to states to help schools and child care facilities test for lead in drinking water, utilizing EPA's 3Ts guidance or applicable state regulations or guidance that are not less stringent.

Indiana's LSP will:

- (1) Reduce children's exposure to lead in drinking water
- (2) Target funding toward schools and child care programs unable to pay for testing
- (3) Utilize the 3Ts model or model no less stringent to establish best practices for a lead in drinking water prevention program
- (4) Foster sustainable partnerships at the state and local level to allow for more efficient use of existing resources and exchange of information among experts in various educational and health sectors

(5) Enhance community, parent, and teacher cooperation and trust.

The activities described in this work plan support the WIIN Programmatic Priorities and EPA's FY 2018-22 Strategic Plan, Goal 1, "Core Mission: Deliver real results to provide Americans with clean air, land, and water, and ensure chemical safety," Objective 1.2, "Provide for Clean and Safe Drinking Water: Ensure waters are clean through improved water infrastructure and, in partnership with states and tribes, sustainably manage programs to support drinking water, aquatic ecosystems, and recreational, economic, and subsistence activities."

V. ANTICIPATED OUTCOMES/OUTPUTS:

Outputs and outcomes expected to be achieved under the agreement are described below.

Outputs for Indiana's LSP will include:

- (1) Using the EPA's 3Ts for Reducing Lead in Drinking Water guidance and the Indiana Department of Environmental Management's ("IDEM") school lead sampling guidance (http://www.state.in.us/idem/cleanwater/files/dw_compliance_lead_school_sampling.pdf) to implement the state program
- (2) Prioritization of testing to target vulnerable communities and populations, such as: child care facilities and schools in underserved and/or low-income communities; child care facilities and schools that primarily care for children six years and under; child care facilities and schools located in older buildings that are more likely to contain lead plumbing
- (3) Providing results of any voluntary testing for lead in school and child care facility drinking water carried out using grant funds and notifying parents, teachers, and organizations of the availability of the results.

Outcomes for Indiana's LSP will include:

- (1) Schools and child care facilities implementing a 3Ts based sampling program. These facilities will mitigate lead exposure by utilizing the 3Ts toolkit and the Indiana Department of Environmental Management's ("IDEM") school lead sampling guidance (http://www.state.in.us/idem/cleanwater/files/dw_compliance_lead_school_sampling.pdf) in determining best actions to take for remediation
- (2) The reduction of children's exposure to lead in drinking water
- (3) Improvement of staff and community knowledge on lead in drinking water and other environmental harms
- (4) Lead exposure reduction in drinking water
- (5) Establishment of routine practices such as those outlined in the 3Ts guidance.

Other outcomes include:

- (1) Fostering sustainable partnerships at the state and local level to allow for a more efficient use of resources and the exchange of information among experts in various areas of school, child care, utility, and health sectors
- (2) The enhancement of community, parent, and teacher trust.

VI. BUDGET NARRATIVE:

The total amount of the two-year agreement with the IFA's contractor will be funded by the FY 18/19 grant award (\$753,000) and the voluntary FY 18/19 state match (\$42,300), the anticipated FY 20 allotment (\$415,000), and additional voluntary state match dollars (\$152,700).

FY 2020 Allotment Request:

Total Project Cost: \$567,700

EPA Funds Requested: \$415,000

Voluntary Cost Share: \$152,700

Total Budget Summary:

	Requested from EPA	Cost Share provided by applicant	Total
Personnel*	n/a	n/a	n/a
Fringe Benefits*	n/a	n/a	n/a
Travel*	n/a	n/a	n/a
Equipment*	n/a	n/a	n/a
Supplies*	n/a	n/a	n/a
Contractual	\$ 415,000	\$ 152,700	\$ 567,700
Other*	n/a	n/a	n/a
Indirect Costs*	n/a	n/a	n/a
Total Budget Summary	\$ 415,000	\$ 152,700	\$ 567,700

Contractual:

Non-Competitive	Requested from EPA	Cost Share provided by applicant	Total
Software-as-a-Service firm to host sample data, coordinate sample collection and analysis, and provide program assistance	\$ 415,000	\$ 152,700	\$ 567,700
Total	\$ 415,000	\$ 152,700	\$ 567,700

*Narrative Note 1: IFA is not seeking compensation from EPA for these costs.

APPENDIX A: PARTNERS UNDER THIS PROGRAM

Below are partners that will be involved in this program.

120Water

250 S Elm St
Zionsville, IN 46077

Indiana Department of Environmental Management

100 N Senate Ave
Indianapolis, IN 46204

Indiana State Department of Health

2 N Meridian Street
Indianapolis, IN 46204

Indiana Head Start Association

1845 W. 18th St.
Indianapolis, IN 46202

Indiana Section American Water Works Association

2680 East Main Street, Suite 106
Plainfield, IN 46168

Indiana Department of Education

115 W. Washington Street
South Tower, Suite 600
Indianapolis, IN 46204

Indiana Association of Public School Superintendents

One N. Capitol Avenue, Suite #1215
Indianapolis, IN 46204

Indiana Association of School Business Officials

One N. Capitol Avenue, Suite #1215
Indianapolis, IN 46204

Additional Partners include:

- Local Health Departments
- Water Utilities.